

UNITED STATES DISTRICT COURT
 for the
 Western District of Washington

In the Matter of the Search of

*(Briefly describe the property to be searched
 or identify the person by name and address)*

)

Case No. MJ21-241

SUBJECT PARCEL bearing delivery confirmation no.
 9405509205568340949106, more fully described in
 Attachment A

)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A, incorporated by reference.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. § 841
 21 U.S.C. § 843

Offense Description

Distribution of Controlled Substances & Unlawful Use of Communication Facility,
 (U.S. Mails) to Distribute Controlled Substances.

The application is based on these facts:

See Affidavit of Postal Inspector Michael D. Harrold, continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: by reliable electronic means; or: telephonically recorded.

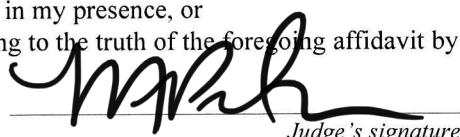

Applicant's signature

Michael D. Harrold, U.S. Postal Inspector

Printed name and title

- The foregoing affidavit was sworn to before me and signed in my presence, or
- The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 04/22/2021


Judge's signature

Michelle L. Peterson, United States Magistrate Judge

Printed name and title

1 | **STATE OF WASHINGTON**)
2) ss
3 | **COUNTY OF KING**)
4

AFFIDAVIT

5 | I, Michael D. Harrold, being first duly sworn on oath, depose and say:

BACKGROUND

6 | 1. **Affiant Background.** I am a United States Postal Inspector, assigned to
7 | investigate the unlawful transportation of contraband, including Title 21 controlled
8 | substances, through the United States mail. I have been a Postal Inspector since
9 | December, 2018, and am currently assigned to the Seattle Division Headquarters office,
10 | located in Seattle, Washington. As part of my duties, I investigate incidents where the
11 | U.S. mail system is used for the purpose of transporting illegal materials, including
12 | controlled substances such as marijuana, cocaine, methamphetamine and heroin, in
13 | violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and substances
14 | mailed in violation of Title 18, United States Code, Section 1716 (injurious articles). I
15 | completed the Criminal Investigator Training Program (CITP) at the Federal Law
16 | Enforcement Training Center (FLETC) and the Naval Criminal Investigative Service
17 | (NCIS). From 2011 to 2018, I was employed as a Special Agent with NCIS. From 2001
18 | to 2011, I was a Trooper with the Georgia State Patrol (GSP), completing Trooper School
19 | at the Georgia Public Safety Training Center (GPSTC). I was a Police Officer with the
20 | Marietta, GA Police Department from 1999 to 2001, completing basic mandate training
21 | at the Northwest Georgia Law Enforcement Academy. I have received specialized
22 | training in the investigation of controlled substances in the U.S. mails. I have also
23 | received training on the identification of controlled substances and interdiction of
24 | controlled substances.

25 | 2. **Duties, Training & Experience.** As part of my duties, I investigate the
26 | use of the U.S. mails to illegally mail and receive controlled substances, the proceeds of
27 | drug trafficking, as well as other instrumentalities associated with drug trafficking, in

1 violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession
2 with intent to distribute controlled substances), and 843(b) (unlawful use of a
3 communication facility, including the U.S. mails, to facilitate the distribution of
4 controlled substances and proceeds from the sale thereof). As set forth below, my
5 training and experience includes identifying parcels with characteristics indicative of
6 criminal activity. During the course of my employment as a law enforcement officer, I
7 have participated in many criminal investigations involving suspicious parcels and
8 controlled substances.

9 3. The information contained in this affidavit is based upon knowledge I
10 gained from my investigation, my personal observations, my training and experience, and
11 investigation by other Inspectors, agents, and officers. Because the purpose of this
12 affidavit is limited to setting forth probable cause to search the SUBJECT PARCEL
13 described below, I have not set forth every fact of which I am aware pertaining to the
14 investigation.

15 4. Through my training and experience, I am aware that the United States
16 Postal Service (USPS) mail system is often used to transport controlled substances and/or
17 the proceeds from the sales of controlled substances throughout the United States. I have
18 learned and observed that sometimes drug traffickers put controlled substances and
19 proceeds in the same parcel. I also know that drug traffickers prefer mail/delivery
20 services such as Express and Priority Mail because of the reliability of these services, as
21 well as the ability to track the article's progress to the intended delivery point. When a
22 drug trafficker learns that a mailed article has not arrived as scheduled, he/she becomes
23 suspicious of any delayed attempt to deliver the item.

24 5. In addition, I am aware that the USPS Express and Priority Mail services
25 were custom-designed to fit the needs of businesses by providing overnight delivery for
26 time sensitive materials. Business mailings often contain typewritten labels, are in flat
27 cardboard mailers, and usually weigh less than eight (8) ounces. In addition, businesses
28

1 using corporate charge accounts print their account number on the Express and Priority
2 Mail label in order to expedite transactions with USPS.

3 6. Based on my training and experience concerning the use of Express and
4 Priority Mail for the transportation of controlled substances and/or proceeds from the
5 sales of controlled substances, I am aware that these parcels usually contain some or all
6 of the following characteristics (which are different than characteristics of parcels being
7 sent by legitimate businesses):

- 8 a. Unlike typical Express and Priority Mail business mailings which
9 usually have typed labels, parcels containing controlled substances
10 and/or proceeds often have handwritten address information. In
11 addition, the address information often contains misspelled words or
12 incomplete/incorrect addresses. This is done in an effort to help
13 conceal the true identities of the individuals involved.
- 14 b. The handwritten label on Express and Priority Mail parcels
15 containing controlled substances and/or proceeds do not contain a
16 business account number and/or credit card number. This often
17 indicates that the sender likely paid cash. A credit card or business
18 account number would more likely enable law enforcement officers
19 to connect the parcel to identifiable individuals.
- 20 c. Express and Priority Mail parcels containing controlled substances
21 and/or proceeds are often distinguishable from typical business
22 mailings as they do not bear any advertising on the mailing
23 container/box, and are typically mailed from one individual to
24 another.
- 25 d. The sender and/or recipient addresses on Express and Priority Mail
26 parcels containing controlled substances and/or proceeds are often
27 either fictitious, or are persons not associated with the addresses
28 listed in USPS or law enforcement databases.
- 29 e. The zip codes for the sender addresses on Express and Priority Mail
30 parcels containing controlled substances and/or proceeds are often
31 different from the zip codes of the post offices from where the
32 parcels were mailed.

f. Express and Priority Mail parcels containing controlled substances and/or proceeds are often heavily taped with tape on the seams of the parcel, in an apparent effort to conceal scent.

g. Express and Priority Mail parcels containing controlled substances and/or proceeds often include a waiver of signature requirement upon delivery.

7. Inspectors who encounter a parcel with any or all of the above characteristics often further scrutinize the parcel by, among other tactics, conducting address verifications using law enforcement databases and conducting trained narcotic-detecting canine examinations.

ITEM TO BE SEARCHED

8. As set forth in Attachment A, this affidavit is made in support of an application for a search warrant for one USPS Priority Mail parcel, hereinafter referred to as the “SUBJECT PARCEL.” This parcel is believed to contain controlled substances or proceeds from the sale of controlled substances. The SUBJECT PARCEL are further described as follows:

SUBJECT PARCEL

9. One USPS Priority Mail parcel addressed to "Melissa Ntrequire 2915 288th ST E Roy, WA 98580-8559" with a return address of "Beach Skin 43143 Lancaster blvd Lancaster, CA 93535" This parcel measures approximately 8.6" X 5.4" X 1.75" with a weight of approximately 1 pound, 0 ounces. This parcel is postmarked April 10, 2021, from zip code 93535 and carries \$7.27 in postage. The delivery confirmation number is 9405509205568340949106. The parcel is currently located at the USPS Seattle Processing and Distribution Center, 10700 27th Ave. S., Seattle, Washington.

ITEMS TO BE SEIZED

10. The application requests that law enforcement officers and agents be authorized to seize the following from the SUBJECT PARCEL, which constitute the fruits, instrumentalities, and evidence of mailing and distribution of controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and

1 possession with intent to distribute controlled substances) and 843(b) (unlawful use of a
2 communication facility, including the U.S. mails, to facilitate the distribution of
3 controlled substances):

- 4 a. Controlled substances, including, but not limited to, cocaine, crack
5 cocaine, fentanyl, heroin, hashish, marijuana, methamphetamine,
MDMA, methadone, oxycodone, and Oxycontin;
- 6 b. Monetary instruments, including but not limited to, currency, money
7 orders, bank checks, or gift cards;
- 8 c. Controlled substance-related paraphernalia;
- 9 d. Documentary evidence relating to the purchase, sale, and/or
10 distribution of controlled substances;
- 11 e. Notes, letters and other items which communicate information
12 identifying the sender and/or recipient or pertaining to the contents
13 of the mailing; and
- 14 f. Fingerprints and/or handwriting, to identify who handled and/or
15 mailed the parcel.

16 THE INVESTIGATION

17 11. On April 19, 2021, the USPS received the SUBJECT PARCEL after it was
18 returned to the USPS by the mail recipient at the listed recipient address. The name listed
19 on the parcel did not receive mail at the address. The SUBJECT PARCEL was identified
20 as suspicious due to being placed in the US Mail in California City, CA but listing a label
21 of Lancaster, CA. The SUBJECT PARCEL was heavily taped. I know through my
22 training and experience that these are tactics commonly used by drug traffickers using the
23 U.S. mails in an attempt to elude detection by law enforcement.

24 12. Using USPS and law enforcement databases, I researched the sender
25 address listed on the SUBJECT PARCEL. I learned that the address “43143 Lancaster
26 blvd Lancaster, CA 93535” is not a true and deliverable address. A business named
27 “Beach Skin” was not located in Lancaster, CA.

13. Using USPS and law enforcement databases, I researched the recipient name and address listed on the SUBJECT PARCEL. I learned that the address "2915 288th ST E Roy, WA 98580-8559" is a true and deliverable address. An individual by the name of "Melissa Ntrequire" was not associated to the address. An individual by the name of "Melissa Rilley" was associated to the address. A check of law enforcement databases showed multiple arrests for "Melissa Rilley" for controlled substance violations.

14. Based upon this information, on April 21, 2020, at approximately 9:50 AM, Inspectors requested the assistance of Officer Kristina Johnson and her canine partner “Remi,” a narcotic-detection dog. Officer Johnson and “Remi” systematically searched a line-up of five parcels, including the SUBJECT PARCEL and four control parcels in an open area at the USPS Seattle Processing and Distribution Center. Postal Inspectors placed the SUBJECT PARCEL in position #4, outside of the view of Officer Johnson and “Remi.” Upon approaching the SUBJECT PARCEL, “Remi” stopped and took several deep breaths and sat. When “Remi” sits, it’s an indication she could smell the positive odor of narcotics coming from the parcel. K9 Officer Johnson’s affidavit describing Remi’s training and qualifications is attached to this affidavit and incorporated herein by reference.

CONCLUSION

15. Based on the facts set forth in this Affidavit, as well as the attached affidavit (incorporated herein by reference) of Officer Johnson, I believe there is probable cause to conclude that the SUBJECT PARCEL contains controlled substances, currency, documents, or other evidence, more fully identified in Attachment B, that relates to the mailing and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute controlled

//

1 substances) and 843(b) (unlawful use of a communication facility, including the U.S.
2 mails, to facilitate the distribution of controlled substances).

3 
4 MICHAEL D. HARROLD
5 U.S. Postal Inspector, US Postal Inspection Service
6
7

8 The above-named agent provided a sworn statement attesting to the truth of the
9 contents of the foregoing affidavit by telephone on the 22nd day of April 2021.

10 
11 MICHELLE L. PETERSON
12 U.S. MAGISTRATE JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTACHMENT A

1. One USPS Priority Mail parcel addressed to "Melissa Ntrequire 2915 288th ST E Roy, WA 98580-8559" with a return address of "Beach Skin 43143 Lancaster blvd Lancaster, CA 93535" This parcel measures approximately 8.6" X 5.4" X 1.75" with a weight of approximately 1 pound, 0 ounces. This parcel is postmarked April 10. 2021, from zip code 93535 and carries \$7.27 in postage. The delivery confirmation number is 9405509205568340949106. The parcel is currently located at the USPS Seattle Processing and Distribution Center, 10700 27th Ave. S., Seattle, Washington.

ATTACHMENT B

Items to be seized

The following items that constitute evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section(s) 841(a)(1), distribution and possession with intent to distribute controlled substances, and 843(b), unlawful use of a communication facility, including the U.S. mails, to facilitate the distribution of controlled substances:

a. Controlled substances, including, but not limited to, cocaine, crack cocaine, fentanyl, heroin, hashish, marijuana, methamphetamine, MDMA, methadone, oxycodone, and Oxycontin;

b. Monetary instruments, including but not limited to, currency, money orders, bank checks, or gift cards;

c. Controlled substance-related paraphernalia;

d. Documentary evidence relating to the purchase, sale, and/or distribution of controlled substances;

e. Notes, letters and other items which communicate information identifying the sender and/or recipient or pertaining to the contents of the mailing; and

f. Fingerprints and/or handwriting, to identify who handled and/or mailed the parcel.



**U.S. Customs and Border Protection
Department of Homeland Security**

**Canine Enforcement Office
19339 28th Ave. S. Bldg. D
Sea-Tac, WA 98188**

AFFIDAVIT

I, Kristina M. Johnson, am a Canine Officer with U.S. Customs and Border Protection, assigned to the Seattle-Tacoma area. My assigned canine, "REMI" (170178) was initially certified with me on April 18, 2018 after successfully completing U.S. Customs and Border Protection detection Re-Team training. Canine "REMI" was trained to detect the odors of concealed humans, Marijuana, Hashish, Cocaine, Heroin, Methamphetamine, Ecstasy Fentanyl and their derivatives. I and canine "REMI" maintain our annual certification through the Customs and Border Protection regulations. This certification is a comprehensive test designed to measure the ability of the dog and the handler in searching for and indicating the presence of controlled substances. This certification consists of searches administered in different environments with a variety of distractions and is designed to duplicate actual field conditions which may be encountered by the canine team. Canine "REMI" must pass 16 of the 17 controlled finds (15 active and 2 blinds) with equates to a 94% or greater accuracy.

I and canine "REMI" participate in maintenance training, which is no less than 16 hours per month. Ongoing training includes:

- Training in all areas of interdiction, such as vehicles, boats, schools, currency, parcels and mail, airports, bus and bus depots, storage units, residences, motels, apartments, etc.
- Training on various quantities of controlled substances, ranging from grams to pounds.
- Training on controlled negative (blank) testing, in which all objects or locations have no contraband present
- Conflict training, which proofs the dog and prevents her from alerting to common items associated with controlled substances, such as plastic bags, etc. and/or reward objects or toys

CBP maintains training records of the on-going training. All training records and certifications are constantly maintained and up to date and current. The dogs are given a rating at each training day that is maintained for 90 days.

The ratings for each training day are based on unsatisfactory, poor, fair, average, good or excellent performance. Canine "REMI" has maintained a rating of "Good" over the last 90 days. Canine "REMI" is trained with a passive response/indication (sit or lay down), with various objects (toys) being her reward. Canine "REMI" last certification was June 17, 2020.

On April 21, 2021, at approximately 9:50 AM, CBPO K-9 Johnson and K-9 REMI (170178) systematically searched a line-up of five parcels, including one suspect parcel and four control parcels in the CBP office. Postal Inspectors placed the suspect parcel in position #4, outside of the view of Officer Johnson and K9 REMI. Upon approaching the suspect parcel, K-9 "REMI" stopped and took several deep breaths and sat. When "REMI" sits, it's an indication that she detects the odor of narcotics coming from the parcel. "REMI" alerted to the following suspect parcel:

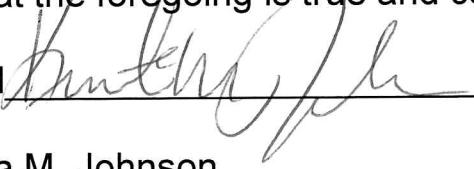
Tracking #: 9405509205568340949106

Sender: Beach Skin
43143 Lancaster blvd
Lancaster, CA 93535

Recipient: Melissa Ntrequire
2915 288th St E
Roy, WA 98580

I have been a Canine Officer since October 2008.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Signed  Date 21 April 2021

Kristina M. Johnson
Canine Enforcement Officer
U.S. Customs and Border Protection
Seattle, WA
(206) 396-1864 (cell)